

(Alexandria Division)

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CLERK US DISTRICT COURT  
ALEXANDRIA, VIRGINIA

Defendant.

[illegible]

Case #1:10-cv-

1135 (AJT/TRJ)

2. Plaintiff Lisa Collins is an adult resident of Arlington, Virginia.

3. Defendant Concept Solutions is a technology consulting company whose principal place of business is in Fairfax, Virginia. As set forth below, it was Ms. Collins's employer within the meaning of the Pregnancy Discrimination Act.

Claim for Relief

4. In September 2006, Ms. Collins began employment with defendant Concept Solutions as a receptionist/administrative assistant.

5. Ms. Collins excelled at her job and was so advised by Barbara Walsh, human resources manager at Concept Solutions, in November 2006. In December 2006, Ms. Collins received a performance-based bonus for her good work.

6. In late December 2006, Ms. Collins learned that she was pregnant. On or about January 5, 2007, she so advised Ms. Walsh and John Krahulec, the company's chief operating officer.

7. On or about January 7, 2007, Phong Mai, the company's chief executive officer, remarked to Ms. Collins that by reason of her pregnancy, "I guess you're going to have a lot of doctors's appointments."

8. On January 29, 2007, with no advance notice, Ms. Collins was verbally informed that she was being discharged because the company was allegedly upgrading her position and needed someone with more skills than she allegedly had to fill it.

9. Ms. Collins's job was filled by a non-pregnant employee who proceeded to do the work she had been doing.

10. On information and belief, the company discharged Ms. Collins because she was pregnant.

11. As a result of defendant's action, Ms. Collins lost her employment. She has lost past, present and future income, suffered humiliation and embarrassment and mental anguish associated with losing her job, and other damages.

12. At all relevant times, it was known to defendant and its managing agents, including those who decided to terminate Ms. Collins, that it was unlawful to terminate an employee just because she was pregnant. Ms. Collins's termination was intentional, malicious, wilful and in knowing derogation of her rights.

13. By its actions set forth above, defendant violated Ms. Collins's rights under the Pregnancy Discrimination Act, 42 U.S.C. §2000e(k).

#### Exhaustion of Administrative Remedies

14. Ms. Collins filed a charge of pregnancy discrimination with the Equal Employment Opportunity Commission ("EEOC") on January 30, 2007.

15. On July 14, 2010, the EEOC sent Ms. Collins's counsel a notice of right-to-sue.

16. On September 16, 2010, the EEOC informed Ms. Collins's counsel that the ninety day deadline for Ms. Collins's filing suit began with the date of receipt of the EEOC's July 14, 2010 notice. A copy of the EEOC's September 16, 2010 letter is attached hereto.

17. This suit is being filed within ninety days of Ms. Collins' receipt of the EEOC's July 14, 2010 notice of right-to-sue.

18. This suit is filed in timely fashion and Ms. Collins has exhausted her administrative remedies relative to her claim.

Relief Requested

Wherefore, Ms. Collins seeks an order of this court declaring that by its actions defendant Concept Solutions has violated her rights under the Pregnancy Discrimination Act, and granting her:

- \* reinstatement and back pay, with interest, from January 2007, in an amount appropriate to the proof at trial;
- \* front pay as appropriate to the proof at trial and to the court's disposition of Ms. Collins's plea for reinstatement;
- \* damages and punitive damages appropriate to the proof at trial;
- \* an award of her reasonable costs, including attorney's fees; and
- \* such other relief as is just.

Ms. Collins requests trial by jury.

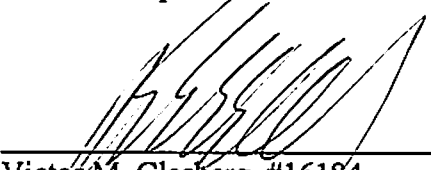
Respectfully submitted,

LISA COLLINS,

By counsel

Dated: October 8, 2010

Counsel for plaintiff:



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